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Attorneys for Defendant STATE OF CALIFORNIA and MICHAEL BELL

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

EDGAR SOLIS,

Plaintiff,

v.

STATE OF CALIFORNIA; and
MICHAEL BELL.

Defendants.

Case No.: 5:23-cv-00515-HDV-JPR

[*Honorable Hernán D. Vera*]
Magistrate Judge Jean P. Rosenbluth

JOINT EXHIBIT LIST

Final Pretrial Conference:

Date: October 8, 2024

Time: 10:00 a.m.

Trial:

Date: October 29, 2024

Time: 09:00 a.m.

Place: Courtroom 10D

1 **TO ALL PARTIES, BY AND THROUGH THEIR ATTORNEYS OF**
2 **RECORD:**

3 Plaintiff Edgar Solis and Defendants State of California and Michael Bell
4 hereby submit the following objections to exhibits which they may utilize during
5 trial. The parties reserve the right to supplement and/or amend these objections to
6 exhibits.

7
8 Respectfully Submitted,

9 DATED: September 10, 2024

LAW OFFICES OF DALE K. GALIPO
LAW OFFICES OF GRECH & PACKER

10
11 By: /s/ Marcel F. Sincich

12 Dale K. Galipo
13 Marcel F. Sincich
14 Trent C. Packer
15 *Attorney for Plaintiff*

16 DATED: September 10, 2024

17 **ROB BONTA**
18 **Attorney General of California**
19 **RHONDA L. MALLORY**
20 **Supervising Deputy Attorney General**

21 By: /s/ David Klehm

22 **DAVID KLEHM**
23 **Deputy Attorney General**
24 *Attorneys for Defendant State of California (by*
25 *and through the California Highway Patrol)*
26
27
28

OBJECTIONS TO EXHIBIT RE. JOINT EXHIBIT LIST

Ex. #	Description	Objection ¹	Response to Objection	Date Admitted
Videos				
1.	603 Hillmer Front Yard Video (relevant portions of AGO 504)	Defendants reserve their right to object to this exhibit because plaintiff has not provided the “relevant portions” of this exhibit.	Plaintiff reserves the right to respond. Plaintiff only plans to admit relevant portions of videos as necessary based on testimony given.	
2.	Screenshots from 603 Hillmer Video	Defendants reserve their right to object to this exhibit because plaintiff has not produced or identified the screenshots that comprise this exhibit.	Plaintiff reserves the right to respond. Plaintiff only plans to admit screenshots as necessary based on testimony given.	
3.	614 Hillmer Front Yard Video 1 (relevant portions of AGO 514)	Defendants reserve their right to object to this exhibit because plaintiff has not provided the “relevant portions” of this exhibit.	Plaintiff reserves the right to respond. Plaintiff only plans to admit relevant portions of videos as necessary based on testimony given.	
4.	Screenshots from 614 Hillmer Front Yard Video 1	Defendants reserve their right to object to this exhibit because plaintiff has not produced or identified the screenshots that	Plaintiff reserves the right to respond. Plaintiff only plans to admit screenshots as necessary based on testimony given.	

¹ Plaintiff and Defendants reserve the right to object portion of documents listed in the following joint exhibit list that are objectionable pursuant to FRE 401, 403, 404, and 801.

Ex. #	Description	Objection ¹	Response to Objection	Date Admitted
		comprise this exhibit.		
5.	614 Hillmer Back Yard Video 1 (relevant portions of AGO 524)	Defendants reserve their right to object to this exhibit because plaintiff has not provided the “relevant portions” of this exhibit.	Plaintiff reserves the right to respond. Plaintiff only plans to admit relevant portions of videos as necessary based on testimony given.	
6.	Screenshots from 614 Hillmer Back Yard Video 1	Defendants reserve their right to object to this exhibit because plaintiff has not produced or identified the screenshots that comprise this exhibit.	Plaintiff reserves the right to respond. Plaintiff only plans to admit screenshots as necessary based on testimony given.	
7.	Deputy Waltermire BWC Video (relevant portions of AGO 506)	Defendants reserve their right to object to this exhibit because plaintiff has not provided the “relevant portions” of this exhibit.	Plaintiff reserves the right to respond. Plaintiff only plans to admit relevant portions of videos as necessary based on testimony given.	
8.	Screenshots from Deputy Waltermire BWC Video	Defendants reserve their right to object to this exhibit because plaintiff has not produced or identified the screenshots that comprise this exhibit.	Plaintiff reserves the right to respond. Plaintiff only plans to admit screenshots as necessary based on testimony given.	
9.	Sergeant Paez BWC Video (relevant portions of AGO 507)	Defendants reserve their right to object to this exhibit because plaintiff has not provided the “relevant portions”	Plaintiff reserves the right to respond. Plaintiff only plans to admit relevant portions of videos as necessary	

Ex. #	Description	Objection ¹	Response to Objection	Date Admitted
		of this exhibit.	based on testimony given.	
10.	Screenshots from Sergeant Paez BWC Video	Defendants reserve their right to object to this exhibit because plaintiff has not produced or identified the screenshots that comprise this exhibit.	Plaintiff reserves the right to respond. Plaintiff only plans to admit screenshots as necessary based on testimony given.	
11.	614 Hillmer Front Yard Video 2 (relevant portions of AGO 518)	Defendants reserve their right to object to this exhibit because plaintiff has not provided the “relevant portions” of this exhibit.	Plaintiff reserves the right to respond. Plaintiff only plans to admit relevant portions of videos as necessary based on testimony given.	
12.	Screenshots from 614 Hillmer Front Yard Video 2	Defendants reserve their right to object to this exhibit because plaintiff has not produced or identified the screenshots that comprise this exhibit.	Plaintiff reserves the right to respond. Plaintiff only plans to admit screenshots as necessary based on testimony given.	
13.	614 Hillmer Front Yard Video 3 (relevant portions of AGO 512)	Defendants reserve their right to object to this exhibit because plaintiff has not provided the “relevant portions” of this exhibit.	Plaintiff reserves the right to respond. Plaintiff only plans to admit relevant portions of videos as necessary based on testimony given.	
14.	Screenshots from 614 Hillmer Front Yard Video 3	Defendants reserve their right to object to this exhibit because plaintiff has not produced or	Plaintiff reserves the right to respond. Plaintiff only plans to admit screenshots as	

Ex. #	Description	Objection ¹	Response to Objection	Date Admitted
		identified the screenshots that comprise this exhibit.	necessary based on testimony given.	
15.	614 Hillmer Back Yard Video 2 (relevant portions of AGO 519)	Defendants reserve their right to object to this exhibit because plaintiff has not provided the “relevant portions” of this exhibit.	Plaintiff reserves the right to respond. Plaintiff only plans to admit relevant portions of videos as necessary based on testimony given.	
16.	Screenshots from 614 Hillmer Back Yard Video 2	Defendants reserve their right to object to this exhibit because plaintiff has not produced or identified the screenshots that comprise this exhibit.	Plaintiff reserves the right to respond. Plaintiff only plans to admit screenshots as necessary based on testimony given.	
17.	614 Hillmer Back Yard Video 3 (relevant portions of AGO 521)	Defendants reserve their right to object to this exhibit because plaintiff has not provided the “relevant portions” of this exhibit.	Plaintiff reserves the right to respond. Plaintiff only plans to admit relevant portions of videos as necessary based on testimony given.	
18.	Screenshots from 614 Hillmer Back Yard Video 3	Defendants reserve their right to object to this exhibit because plaintiff has not produced or identified the screenshots that comprise this exhibit.	Plaintiff reserves the right to respond. Plaintiff only plans to admit screenshots as necessary based on testimony given.	
Law Enforcement Records				
19.	*Evidence Report (relevant portions of AGO 382-391)	Defendants reserve their right to object to this exhibit	For impeachment or to refresh recollection as	

Ex. #	Description	Objection ¹	Response to Objection	Date Admitted
		because plaintiff has not provided the “relevant portions” of this exhibit.	indicated; relevant portions to be used as necessary based on testimony given.	
20.	*Photography and Video Evidence Report (relevant portions of AGO 368-76)	Defendants reserve their right to object to this exhibit because plaintiff has not provided the “relevant portions” of this exhibit.	For impeachment or to refresh recollection as indicated; relevant portions to be used as necessary based on testimony given.	
21.	*RCSD Report by Deputy Cline re 614 N. Hillmer Dr. (relevant portions of 039. 030222)	Defendants reserve their right to object to this exhibit because plaintiff has not provided the “relevant portions” of this exhibit.	For impeachment or to refresh recollection as indicated; relevant portions to be used as necessary based on testimony given.	
22.	*RCSD Report by Deputy Kroll re Forensic Report Processing the Suspect Mustang (relevant portions of 042. 051922)	Defendants reserve their right to object to this exhibit because plaintiff has not provided the “relevant portions” of this exhibit.	For impeachment or to refresh recollection as indicated; relevant portions to be used as necessary based on testimony given.	
Photographs				
23.	Photos of Bell (AGO 727-729)			
24.	Photos of Bell Gun (AGO 604, 606, 687)			
25.	Photos of Paez (AGO 630-642, 750-53)			
26.	Photos of Sobaszek			

Ex. #	Description	Objection ¹	Response to Objection	Date Admitted
	(AGO 643-650)			
27.	Photos of Waltermire (AGO 693-726)			
28.	Photos of Waltermire Gun (AGO 679, 684)			
29.	Photos of Stealth Explorer (AGO 530)	Objection to term "Stealth" FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative;	"Stealth Explorer" was termed by Defendant Bell, highly relevant to the type of vehicle that approached Plaintiff's car.	
30.	Photos of Green Mustang (AGO 547-552, 592, 595-96, 657)			
31.	Photos of 633 Hillmer (AGO 629, 658, 660, 662, 664, 666-67)			
32.	Photos of 614 Hillmer (AGO 852-54, 1007-08)			
33.	Photos of Bell First Volley (AGO 888-92, 895, 955-57, 959-61, 963, 965, 967-68, 971-72, 975-76, 978-81, 986-87, 989, 991, 993-97, 1000-01, 1003-04, 1028, 1032, 1034-36, 1038-39, 1146, 1148)	Objection to the description of this Exhibit as Bell First Volley- Inflammatory and Inaccurate. FRE 602 & 611 speculation, lacks foundation.	Undisputed by Defendant Bell's testimony that he fired two volleys; listed photos are relevant and accurate evidence of trajectory of fire for first volley of shots fired.	

Ex. #	Description	Objection ¹	Response to Objection	Date Admitted
34.	Photos of Bell Second Volley (AGO 896-98, 902- 04, 1011, 1041, 1046, 1079-80, 1087-91, 1100- 1101, 1104-05, 1110-11, 1114, 1116, 1121, 1130, 1133, 1137-38, 1141, 1143-44)	Objection to the description of this Exhibit as Bell Second Volley. FRE 602 & 611 speculation, lacks foundation.	Undisputed by Defendant Bell's testimony that he fired two volleys; listed photos are relevant and accurate evidence of trajectory of fire for second volley of shots fired.	
35.	Photos of Solis in Hospital (AGO 765-66, 1221-33)			
36.	Photos of Edgar Solis (P 4064-4084)	FRE 403 unduly prejudicial, cumulative; FRE 602 & 611 speculation, lacks foundation.	Relevant to damages, not outweighed by prejudice; foundation to be given by Plaintiff.	
37.	GLA Initial Scene Assessment (produced in Expert Disclosures)	Objection to term Scene Assessment as these were not taken at the scene on the date of the incident. These are demonstrative exhibits not evidence. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 602 & 611 speculation, lacks foundation.	Relevant as accurate description of scene not provided by investigators reports; relevant and not hearsay as impeachment of Defendant Bell's testimony; foundation given by Plaintiff's investigator who conducted the scene assessment.	

Ex. #	Description	Objection ¹	Response to Objection	Date Admitted
38.	GLA Second Scene Assessment (produced in Expert Disclosures)	Objection to term Scene Assessment as these were not taken at the scene on the date of the incident. These are demonstrative exhibits not evidence. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 602 & 611 speculation, lacks foundation.	Relevant as accurate description of scene not provided by investigators reports; relevant and not hearsay as impeachment of Defendant Bell's testimony; foundation given by Plaintiff's investigator who conducted the scene assessment.	
39.	GLA Investigation Scene Photos (produced in Expert Disclosures)	Objection to term Scene Assessment as these were not taken at the scene on the date of the incident. These are demonstrative exhibits not evidence. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 602 & 611 speculation, lacks foundation.	Relevant as accurate description of scene not provided by investigators reports; relevant and not hearsay as impeachment of Defendant Bell's testimony; no hearsay included; foundation given by Plaintiff's investigator who conducted the scene assessment.	
40.	Maps Marked During Statements (AGO 335-336)	Objection. These markings on maps are demonstrative exhibits not	FRE 801(d)(2)(a), Party opponent admission. Relevant to	

Ex. #	Description	Objection ¹	Response to Objection	Date Admitted
		evidence. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 602 & 611 speculation, lacks foundation.	Defendant's testimony and claimed description of the incident.	
41.	Sgt. Paez Depo Exhibit 2	Objection. This is not an accurate depiction of the scene at the time of the incident and is a demonstrative exhibit not evidence. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 602 & 611 speculation, lacks foundation.	FRE 801, Not hearsay; impeachment of Defendant; relevant to position of parties at the time of the shots fired; based on person knowledge of deponent.	
42.	Det. Sobaszek Depo Exhibit 4	Objection. This is not an accurate depiction of the scene at the time of the incident and is a demonstrative exhibit not evidence. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 602 & 611 speculation, lacks foundation.	FRE 801, Not hearsay; relevant to position of parties at the time of the shots fired; based on person knowledge of deponent.	

Ex. #	Description	Objection ¹	Response to Objection	Date Admitted
43.	Demonstrative Yellow Dummy Gun	Objection This is a demonstrative exhibit not evidence. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 602 & 611 speculation, lacks foundation.	Listed as demonstrative. Not hearsay. Not testimonial.	
44.	Demonstrative Fence	Objection. This is inflammatory and inaccurate. Objection This is a demonstrative exhibit not evidence. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 602 & 611 speculation, lacks foundation.	Listed as demonstrative. Not hearsay. Not testimonial.	
Plaintiff's Medical Records				
45.	RUHS Medical Records (selected from P 1-2625)			
46.	Riverside Medical Records (selected from P 2625-2854, 2984-4063)			
47.	High Desert Medical Records (selected from P 2855-2892)			

Ex. #	Description	Objection ¹	Response to Objection	Date Admitted
48.	Wasco Medical Records (selected from P2893-2983)			
49.	CDCR Medical Records (selected from 4085-8899)			
50.	(Reserved)			
51.	High Desert Imaging (P 4085)			
52.	RUHS Imaging (P 4086)			
Officer Statements to Detectives*				
53.	Officer Bell CIIT Statement (relevant portions of AGO 497)	Objection. Confidential compelled statement of a Law Enforcement Officer.	For impeachment or to refresh recollection as indicated; does not qualify for a confidential designation.	
54.	Transcript of Officer Bell CIIT Statement (relevant portions AGO 68-161)	Objection. Confidential compelled statement of a Law Enforcement Officer.	For impeachment or to refresh recollection as indicated; does not qualify for a confidential designation.	
55.	Officer Bell CHP Statement (relevant portions of AGO 500)	Objection. Confidential compelled statement of a Law Enforcement Officer.	For impeachment or to refresh recollection as indicated; does not qualify for a confidential designation.	
56.	Transcript of Officer Bell CHP Statement	Objection. Confidential compelled statement	For impeachment or to refresh recollection as	

Ex. #	Description	Objection ¹	Response to Objection	Date Admitted
	(relevant portions AGO 162-192)	of a Law Enforcement Officer.	indicated; does not qualify for a confidential designation.	
57.	Deputy Waltermire Statement (relevant portions of AGO 499)	Objection. Hearsay. Plaintiff has not shown the witness is unavailable to testify. FRE 801 hearsay.	For impeachment or to refresh recollection as indicated.	
58.	Transcript of Deputy Waltermire Statement (relevant portions of AGO 193-248)	Objection. Hearsay. Plaintiff has not shown the witness is unavailable to testify. FRE 801 hearsay.	For impeachment or to refresh recollection as indicated.	
59.	Officer Sobaszek Statement (relevant portion AGP 501)	Objection. Hearsay. Plaintiff has not shown the witness is unavailable to testify. FRE 801 hearsay.	For impeachment or to refresh recollection as indicated.	
60.	Transcript of Officer Sobaszek Statement (relevant portions of AGO 294-300)	Objection. Hearsay. Plaintiff has not shown the witness is unavailable to testify. FRE 801 hearsay.	For impeachment or to refresh recollection as indicated.	
61.	Sgt. Paez Statement (relevant portions of AGO 502)	Objection. Hearsay. Plaintiff has not shown the witness is unavailable to testify. FRE 801 hearsay.	For impeachment or to refresh recollection as indicated.	
62.	Transcript of Sgt. Paez Statement (relevant portions of AGO 301-334)	Objection. Hearsay. Plaintiff has not shown the witness is unavailable to testify. FRE 801 hearsay.	For impeachment or to refresh recollection as indicated.	

* For impeachment or to refresh recollection.

Defendants' Additional Exhibits				
<u>No.</u>	<u>Description</u>	<u>Objection</u>	<u>Response</u>	<u>Ruling</u>
101.	Composite Videos of Multiple individual homeowner videos	FRE 401, 403, 801; untimely, FRCP 26.	Aid to assist jury to view multiple separate residential surveillance video exhibits from different angles as one single exhibit with a composite contemporaneous real time view.	
102.	Critical Incident Investigation - C22-601-001 [AGO 1-7]	P MILs 1-4. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 404 impermissible character evidence; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Findings which dispute Plaintiff's expert's opinion that Officer Bell did not comply with CHP's Policies. <i>Phillips v. Bratton</i> , 2008 WL 11409876, at *10 (Case No. CV 07-873 CAS (VBKX), C.D. Cal. Jan. 28, 2008). Corroborates defendant Officer Bell's observations that plaintiff was actively resisting and evading arrest because plaintiff was aware that he would be sent back	

			to prison due to being a felon in possession of a firearm and narcotics.	
103.	Summary of Incident [AGO 10-13]	P MILs 1-4. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 404 impermissible character evidence; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Findings which dispute Plaintiff's expert's opinion that Officer Bell did not comply with CHP's Policies. <i>Phillips v. Bratton</i> , 2008 WL 11409876, at *10 (Case No. CV 07-873 CAS (VBKX), C.D. Cal. Jan. 28, 2008). Corroborates defendant Officer Bell's observations that plaintiff was actively resisting and evading arrest because plaintiff was aware that he would be sent back to prison due to being a felon in possession of a firearm and narcotics.	
104.	Scene Description	P MILs 1-4. FRE 801 hearsay.	Official Record.	

1	[AGO 14-18]	FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 404 impermissible character evidence; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion.	FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Findings which dispute Plaintiff's expert's opinion that Officer Bell did not comply with CHP's Policies. <i>Phillips v. Bratton</i> , 2008 WL 11409876, at *10 (Case No. CV 07- 873 CAS (VBKX), C.D. Cal. Jan. 28, 2008).	
14	105. Suspect's Profile [AGO 21-41]	P MILs 1-4. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 404 impermissible character evidence; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Corroborates defendant Officer Bell's observations that plaintiff was actively resisting and evading arrest because plaintiff was aware that he would be sent back to prison due to being a felon in possession of a firearm and narcotics.	
27	106. Crime Scene Evidence Collection & Storage [AGO 43]	P MIL 1. FRE 801 hearsay. FRE 401 irrelevant info. unknown;	Official Record. FRE 803(8)(A)(i) and (iii).	

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		FRE 403 unduly prejudicial, cumulative; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion.	Business Record. FRE 803(6)(B). Corroborates defendant Officer Bell's observations that plaintiff was actively resisting and evading arrest because plaintiff was aware that he would be sent back to prison due to being a felon in possession of a firearm and narcotics.	
107.	Injury Descriptions [AGO 44]	P MIL 1. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B).	
108.	Forensic Examination [AGO 45]	P MIL 1. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 602 & 611 speculation, lacks foundation.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Corroborates defendant Officer Bell's observations that plaintiff was actively resisting and evading arrest because plaintiff was aware that he would be sent back	

			to prison due to being a felon in possession of a firearm and narcotics.	
109.	Maps [AGO 335-336]	FRE 801 hearsay.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B).	
110.	Diagrams [AGO 367]	P MIL 1. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 602 & 611 speculation, lacks foundation.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B).	
111.	Photography and Video CONFIDENTIAL [AGO 368-376]	P MIL 1. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 602 & 611 speculation, lacks foundation.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Corroborates defendant Officer Bell's observations that plaintiff was actively resisting and evading arrest because plaintiff was aware that he would be sent back to prison due to being a felon in possession of a firearm and narcotics.	
112.	Receipt for Property	P MIL 1. FRE 801 hearsay.	Official Record.	

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	Booked into Evidence [AGO 379-391]	FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 602 & 611 speculation, lacks foundation.	FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Corroborates defendant Officer Bell's observations that plaintiff was actively resisting and evading arrest because plaintiff was aware that he would be sent back to prison due to being a felon in possession of a firearm and narcotics.	
113.	Blood Alcohol Toxicology Report [AGO 392-394]	P MILs 1-4. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 404 impermissible character evidence; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Corroborates defendant Officer Bell's observations that plaintiff was actively resisting and evading arrest because plaintiff was aware that he would be sent back to prison due to being a felon in possession of a firearm and narcotics. Also, is relevant to plaintiff's damages because a person who did not have	

			methamphetamine and PCP in their body would most likely not have continued to evade and resist arrest after being shot with a .40 caliber bullet.	
114.	Crime Scene logs [AGO 395-399]	P MIL 1. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 602 & 611 speculation, lacks foundation.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Corroborates defendant Officer Bell's observations that plaintiff was actively resisting and evading arrest because plaintiff was aware that he would be sent back to prison due to being a felon in possession of a firearm and narcotics.	
115.	Press Release [AGO 408-450]	P MIL 1. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 602 & 611 speculation, lacks foundation.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B).	
116.	District Attorney's Findings [AGO 451]	P MILs 1-3. FRE 801 hearsay. FRE 401 irrelevant info. unknown;	Official Record. FRE 803(8)(A)(i) and (iii). Business Record.	

		FRE 403 unduly prejudicial, cumulative; FRE 404 impermissible character evidence; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion	FRE 803(6)(B). Findings which dispute Plaintiff's expert's opinion that Officer Bell did not comply with CHP's Policies. <i>Phillips v. Bratton</i> , 2008 WL 11409876, at *10 (Case No. CV 07-873 CAS (VBKX), C.D. Cal. Jan. 28, 2008).	
117.	Criminal Case [AGO 452]	P MIL 1. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 404 impermissible character evidence; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Corroborates defendant Officer Bell's observations that plaintiff was actively resisting and evading arrest because plaintiff was aware that he would be sent back to prison due to being a felon in possession of a firearm and narcotics	
118.	Policy and Procedure Evaluation Report CONFIDENTIAL [AGO 488-496]	P MILs 1-5. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Findings which	

		404 impermissible character evidence; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion.	dispute Plaintiff's expert's opinion that Officer Bell did not comply with CHP's Policies. <i>Phillips v. Bratton</i> , 2008 WL 11409876, at *10 (Case No. CV 07-873 CAS (VBKX), C.D. Cal. Jan. 28, 2008).	
119.	Hemet PD Dispatch CONFIDENTIAL .wav [AGO 498] INITIAL DISCLOSURES 1	P MILs 1. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 602 & 611 lacks foundation.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B).	
120.	603 Hillmer.MOV [AGO 504]	Duplicative of Exh. No. 1. FRE 401, 403, 801.	May not be duplicative because plaintiff has not produced the "relevant portions" of plaintiff's exhibit.	
121.	603 Hilmer- SPANISH.mp4 [AGO 505]	FRE 401, 403, 801.	Accurate depiction of the scene at the time of the incident.	
122.	2022-03-02_16-09- 20.AVI [AGO 506]	Duplicative of Exh. No. 7. FRE 401, 403, 801.	May not be duplicative because plaintiff has not produced the "relevant portions" of plaintiff's exhibit.	

1	123.	Axon_Body_3_Video _2022-03-02_1609_ X6033338V .mp4 Footage from Hemet Police Department Sergeant Paez BWC [AGO 507]	Duplicative of Exh. No. 9. FRE 401, 403, 801.	May not be duplicative because plaintiff has not produced the “relevant portions” of plaintiff’s exhibit.	
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8	124.	AYPV2506.MP4 Front Yard Surveillance Multiple Vehicles Parked In Front of Residence [AGO 508] INITIAL DISCLOSURES 2A	FRE 401, 403, 801.	Accurately depicts the scene on the date of the incident showing the police response.	
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14	125.	BKSJ2054.MP4 Backyard Surveillance Video Officers Walking through the Backyard [AGO 509] INITIAL DISCLOSURES 2b	FRE 401, 403, 801.	Accurately depicts the scene on the date of the incident showing the police collecting evidence at the scene.	
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20	126.	DHCY0843.MP4 Front Yard Surveillance Officers Locating Bullet Holes After the Incident [AGO 510] INITIAL DISCLOSURES 2a	FRE 401, 403, 801.	Accurately depicts the scene on the date of the incident showing the police collecting evidence at the scene.	
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25	127.	FDDR7512.MP4 Front Yard Surveillance Video Additional Officers Arriving at the Scene	FRE 401, 403, 801.	Accurately depicts the scene on the date of the incident showing the police response.	
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	[AGO 511] INITIAL DISCLOSURES 2a			
128.	HFPP8390.MP4 Front Yard Surveillance Additional Officers Arriving at the Scene Immediately After the Incident Occurred [AGO 512] INITIAL DISCLOSURES 2a	Duplicative of Exh. No. 13. FRE 401, 403, 801.	May not be duplicative because plaintiff has not produced the “relevant portions” of plaintiff’s exhibit.	
129.	HMKO9684.MP4 Front Yard Surveillance Multiple Patrol Vehicle Parked in Front of the Residence [AGO 513] INITIAL DISCLOSURES 2a	FRE 401, 403, 801.	Accurately depicts the scene on the date of the incident showing the police response.	
130.	KTKM2053.MP4 Front Yard Surveillance Videos Officer in Foot Pursuit Running Toward the Front of the Residence [AGO 514] INITIAL DISCLOSURES 2a	Duplicative of Exh. No. 3. FRE 401, 403, 801.	May not be duplicative because plaintiff has not produced the “relevant portions” of plaintiff’s exhibit.	
131.	LIGD2098.MP4 Front Yard Surveillance Videos Multiple Patrol Vehicles Parked in Front of Residence [AGO 515] INITIAL	FRE 401, 403, 801.	Accurately depicts the scene on the date of the incident showing the police response.	

	DISCLOSURES 2a			
132.	LMQZ6399.MP4 Front Yard Surveillance Videos Officer Walking Through the Front Yard [AGO 516] INITIAL DISCLOSURES 2a	FRE 401, 403, 801.	Accurately depicts the scene on the date of the incident showing the police response.	
133.	MCII8645.MP4 Front Yard Surveillance Videos Officers Walking Through the Front Yard After the Caution Tape was Put Up [AGO 517] INITIAL DISCLOSURES 2a	FRE 401, 403, 801.	Accurately depicts the scene on the date of the incident showing the police response.	
134.	MMXM3627.MP4 Front Yard Surveillance Videos Officers Running Towards the Shooting Scene with Multiple Guns Shots Heard [AGO 518] INITIAL DISCLOSURES 2a	Duplicative of Exh. No. 11. FRE 401, 403, 801.	May not be duplicative because plaintiff has not produced the “relevant portions” of plaintiff’s exhibit.	
135.	MRAK2661.MP4 Backyard Surveillance Videos Officers Talking in Backyard [AGO 519] INITIAL DISCLOSURES 2b	Duplicative of Exh. No. 15. FRE 401, 403, 801.	May not be duplicative because plaintiff has not produced the “relevant portions” of plaintiff’s exhibit.	

136.	NCWE2879.MP4 Backyard Surveillance Videos Officers Walking through Backyard [AGO 520] INITIAL DISCLOSURES 2b	FRE 401, 403, 801.	Accurately depicts the scene on the date of the incident showing the police response.	
137.	NDBQ2555.MP4 Backyard Surveillance Video Officers Walking through the Backyard [AGO 521] INITIAL DISCLOSURES 2b	Duplicative of Exh. No. 17. FRE 401, 403, 801.	May not be duplicative because plaintiff has not produced the “relevant portions” of plaintiff’s exhibit.	
138.	NNCY2467.MP4 Backyard Surveillance Video Officer Walking through the Backyard [AGO 522] INITIAL DISCLOSURES 2b	FRE 401, 403, 801.	Accurate depiction of the scene on the date of the incident.	
139.	OJMQ5886.MP4 Backyard Surveillance Video Officer Walking through the Backyard and using the Radio to Request Additional Officer to the Front Yard [AGO 523] INITIAL DISCLOSURES 2b	FRE 401, 403, 801.	Accurate depiction of the scene on the date of the incident.	
140.	UGGK1245.MP4 Backyard	Duplicative of Exh. No. 5. FRE 401,	May not be duplicative because	

	Surveillance Videos Officers with Guns Drawn and Instructing the Suspect to Drop the Gun. Multiple Gun Shots Heard [AGO 524] INITIAL DISCLOSURES 2b	403, 801.	plaintiff has not produced the “relevant portions” of plaintiff’s exhibit.	
141.	VVPM1227.MP4 Backyard Surveillance Officer is Heard Instructing the Suspect to Get on the Ground [AGO 525] INITIAL DISCLOSURES 2b	FRE 401, 403, 801.	Accurate depiction of the scene on the date of the incident and giving commands to plaintiff.	
142.	WNRG1367.MP4 Front Yard Surveillance Video Officer Returning to the Patrol Vehicle to Obtain Medical Equipment [AGO 526] INITIAL DISCLOSURES 2a	FRE 401, 403, 801.	Accurate depiction of the scene on the date of the incident and in the process of providing medical aid to plaintiff.	
143.	WRLN1188.MP4 Front Yard Surveillance Video Multiple Officers Walking through the Front Yard [AGO 527] INITIAL DISCLOSURES 2a	FRE 401, 403, 801.	Accurate depiction of the scene on the date of the incident.	
144.	XBDK3186.MP4 Front Yard Surveillance Video	FRE 401, 403, 801.	Accurate depiction of the scene on the date of the	

	Officer Walking through the Front Yard [AGO 528] INITIAL DISCLOSURES 2a		incident.	
145.	XMDR0023.MP4 Backyard Surveillance Video Officers Walking through the Backyard [AGO 529] INITIAL DISCLOSURES 2a	FRE 401, 403, 801.	Accurate depiction of the scene on the date of the incident.	
146.	OIS-655-03022022 Combined Photos 1 Subset CONFIDENTIAL [AGO 530-546]	FRE 401, 403.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Accurate depiction of the scene on the date of the incident.	
147.	OIS-655-03022022 Combined Photos 1 [AGO 547-603]	FRE 401, 403.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Accurate depiction of the scene on the date of the incident.	
148.	OIS-655-03022022 Combine Photos 2 Subset CONFIDENTIAL [AGO 604-629]	FRE 401, 403.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Accurate depiction of the scene on the date of the incident.	

1	149.	OIS-655-03022022 Combined Photos 2 [AGO 630-678]	FRE 401, 403.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Accurate depiction of the scene on the date of the incident.	
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7	150.	OIS-655-03022022 Combined Photos 3 Subset CONFIDENTIAL [AGO 679-687]	FRE 401, 403.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Accurate depiction of the scene on the date of the incident.	
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13	151.	OIS-655-03022022 Combined Photos 3 [AGO 688-753]	FRE 401, 403.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Accurate depiction of the scene on the date of the incident.	
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19	152.	OIS-655-03022022 Combined Photos 3 [AGO 688-753]	FRE 401, 403.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Accurate depiction of the scene on the date of the incident.	
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25	153.	OIS-655-03022022 Combine Photos 4 Subset CONFIDENTIAL [AGO 754-764]	FRE 401, 403.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B).	
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4	154.	OIS-655-03022022 Combined Photos 4 [AGO 765-828]	FRE 401, 403.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Accurate depiction of the scene on the date of the incident.
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10	155.	OIS-655-03022022 Combined Photos 5 Subset CONFIDENTIAL [AGO 829-848]	FRE 401, 403.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Accurate depiction of the scene on the date of the incident.
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16	156.	OIS-655-03022022 Combined Photos 5 [AGO 849-881]	FRE 401, 403.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Accurate depiction of the scene on the date of the incident.
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22	157.	OIS-655-03022022 Combined Photos 6 Subset CONFIDENTIAL [AGO 882-886]	FRE 401, 403.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Accurate depiction of the scene on the date of the incident.
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28	158.	OIS-655-03022022	FRE 401, 403.	Official Record.

	Combined Photos 6 [AGO 887-956]		FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Accurate depiction of the scene on the date of the incident.	
159.	OIS-655-03022022 Combined Photos 7 [AGO 957-1006]	FRE 401, 403.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Accurate depiction of the scene on the date of the incident.	
160.	OIS-655-03022022 Combined Photos 8 Subset CONFIDENTIAL [AGO 1007-1010]	FRE 401, 403.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Accurate depiction of the scene on the date of the incident.	
161.	OIS-655-03022022 Combined Photos 8 [AGO 1011-1070]	FRE 401, 403.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Accurate depiction of the scene on the date of the incident.	
162.	OIS-655-03022022 Combined Photos 9 [AGO 1071-1145]	FRE 401, 403.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Accurate depiction	

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			of the scene on the date of the incident.	
163.	OIS-655-03022022 Combined Photos [AGO 1146-1219]	FRE 401, 403.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Accurate depiction of the scene on the date of the incident.	
164.	OIS-655-03022022 Combined Photos 11 CONFIDENTIAL [AGO 1220-1236]	FRE 401, 403.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Accurate depiction of the scene on the date of the incident.	
165.	Michael Bell Training Records [AGO 1237-1273]	P MILs 1. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 602 & 611 lacks foundation.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Findings which dispute Plaintiff's expert's opinion that Officer Bell did not comply with CHP's Policies. <i>Phillips v. Bratton</i> , 2008 WL 11409876, at *10 (Case No. CV 07-873 CAS (VBKX), C.D. Cal. Jan. 28, 2008).	

1	166.	CH1 HPM 70.6, Chapter 1 Use of Force [AGO 1274-1295]	P MIL 1. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 404 impermissible character evidence; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Findings which dispute Plaintiff's expert's opinion that Officer Bell did not comply with CHP's Policies. <i>Phillips v. Bratton</i> , 2008 WL 11409876, at *10 (Case No. CV 07-873 CAS (VBKX), C.D. Cal. Jan. 28, 2008).	
14	167.	LD20 TTS Training and Testing Specifications for Learning Domain #20 Use of Force/Deescalation, dated October 1, 2020 [AGO 1296-1304]	P MIL 1. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 404 impermissible character evidence; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Findings which dispute Plaintiff's expert's opinion that Officer Bell did not comply with CHP's Policies. <i>Phillips v. Bratton</i> , 2008 WL 11409876, at *10 (Case No. CV 07-873 CAS (VBKX), C.D. Cal. Jan. 28, 2008).	
28	168.	LD20-MOD 2 Use of	P MIL 1.	Official Record.	

1		Force Enforcement Tactics Unit Power Point[AGO 1305]	FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 404 impermissible character evidence; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion.	FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Findings which dispute Plaintiff's expert's opinion that Officer Bell did not comply with CHP's Policies. <i>Phillips v. Bratton</i> , 2008 WL 11409876, at *10 (Case No. CV 07- 873 CAS (VBKX), C.D. Cal. Jan. 28, 2008).	
14	169.	LD20-MOD 3 [AGO 1306]	P MIL 1. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 404 impermissible character evidence; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Findings which dispute Plaintiff's expert's opinion that Officer Bell did not comply with CHP's Policies. <i>Phillips v. Bratton</i> , 2008 WL 11409876, at *10 (Case No. CV 07- 873 CAS (VBKX), C.D. Cal. Jan. 28, 2008).	
27	170.	LD20-MOD 4 [AGO 1307]	P MIL 1. FRE 801 hearsay.	Official Record. FRE 803(8)(A)(i)	

		FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 404 impermissible character evidence; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion.	and (iii). Business Record. FRE 803(6)(B). Findings which dispute Plaintiff's expert's opinion that Officer Bell did not comply with CHP's Policies. <i>Phillips v. Bratton</i> , 2008 WL 11409876, at *10 (Case No. CV 07-873 CAS (VBKX), C.D. Cal. Jan. 28, 2008).	
171.	LD20-MOD 5 [AGO 1308]	P MIL 1. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 404 impermissible character evidence; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Findings which dispute Plaintiff's expert's opinion that Officer Bell did not comply with CHP's Policies. <i>Phillips v. Bratton</i> , 2008 WL 11409876, at *10 (Case No. CV 07-873 CAS (VBKX), C.D. Cal. Jan. 28, 2008).	
172.	LD20-MOD 6 [AGO 1309]	P MIL 1. FRE 801 hearsay. FRE 401 irrelevant	Official Record. FRE 803(8)(A)(i) and (iii).	

		info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 404 impermissible character evidence; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion.	Business Record. FRE 803(6)(B). Findings which dispute Plaintiff's expert's opinion that Officer Bell did not comply with CHP's Policies. <i>Phillips v. Bratton</i> , 2008 WL 11409876, at *10 (Case No. CV 07-873 CAS (VBKX), C.D. Cal. Jan. 28, 2008).	
173.	Deadly [AGO 1310]	P MIL 1. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 404 impermissible character evidence; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Findings which dispute Plaintiff's expert's opinion that Officer Bell did not comply with CHP's Policies. <i>Phillips v. Bratton</i> , 2008 WL 11409876, at *10 (Case No. CV 07-873 CAS (VBKX), C.D. Cal. Jan. 28, 2008).	
174.	Non-deadly [AGO 1311]	P MIL 1. FRE 801 hearsay. FRE 401 irrelevant info. unknown;	Official Record. FRE 803(8)(A)(i) and (iii). Business Record.	

1		FRE 403 unduly prejudicial, cumulative; FRE 404 impermissible character evidence; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion.	FRE 803(6)(B). Findings which dispute Plaintiff's expert's opinion that Officer Bell did not comply with CHP's Policies. <i>Phillips v. Bratton</i> , 2008 WL 11409876, at *10 (Case No. CV 07-873 CAS (VBKX), C.D. Cal. Jan. 28, 2008).	
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12	175.	Media1.wmv - Training Video CHP Officers Gunned Down[AGO 1312].	P MIL 1. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 404 impermissible character evidence; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Findings which dispute Plaintiff's expert's opinion that Officer Bell did not comply with CHP's Policies. <i>Phillips v. Bratton</i> , 2008 WL 11409876, at *10 (Case No. CV 07-873 CAS (VBKX), C.D. Cal. Jan. 28, 2008).
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25	176.	Media2.mwv - Training Video Keeping Safe Distance [AGO 1313].	P MIL 1. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B).
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		prejudicial, cumulative; FRE 404 impermissible character evidence; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion.	Findings which dispute Plaintiff's expert's opinion that Officer Bell did not comply with CHP's Policies. <i>Phillips v. Bratton</i> , 2008 WL 11409876, at *10 (Case No. CV 07-873 CAS (VBKX), C.D. Cal. Jan. 28, 2008).	
177.	Media3.mwv - Training Video Officer Shot Upon Approaching Vehicle Window[AGO 1314].	P MIL 1. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 404 impermissible character evidence; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Findings which dispute Plaintiff's expert's opinion that Officer Bell did not comply with CHP's Policies. <i>Phillips v. Bratton</i> , 2008 WL 11409876, at *10 (Case No. CV 07-873 CAS (VBKX), C.D. Cal. Jan. 28, 2008).	
178.	Media4.wmv – Training Video Texas Police Dash Cam of Officer Pursuing Suspects Shot in Face [AGO 1315]	P MIL 1. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial,	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Findings which	

		cumulative; FRE 404 impermissible character evidence; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion.	dispute Plaintiff's expert's opinion that Officer Bell did not comply with CHP's Policies. <i>Phillips v. Bratton</i> , 2008 WL 11409876, at *10 (Case No. CV 07-873 CAS (VBKX)), C.D. Cal. Jan. 28, 2008).	
179.	Media5.wmv – Training Video Cop Indicted in Baton Beating [AGO 1316]	P MIL 1. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 404 impermissible character evidence; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Findings which dispute Plaintiff's expert's opinion that Officer Bell did not comply with CHP's Policies. <i>Phillips v. Bratton</i> , 2008 WL 11409876, at *10 (Case No. CV 07-873 CAS (VBKX)), C.D. Cal. Jan. 28, 2008).	
180.	Media6.wmv – Training Video Deputy Shoots and Kills Suspect After Scuffle in Florida [AGO 1317]	P MIL 1. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Findings which dispute Plaintiff's	

		404 impermissible character evidence; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion.	expert's opinion that Officer Bell did not comply with CHP's Policies. <i>Phillips v. Bratton</i> , 2008 WL 11409876, at *10 (Case No. CV 07-873 CAS (VBKX), C.D. Cal. Jan. 28, 2008).	
181.	Media7.wmv – Training Video Long Beach Police Caught on Camera Bating Suspect with Baton [AGO 1318]	P MIL 1. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 404 impermissible character evidence; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Findings which dispute Plaintiff's expert's opinion that Officer Bell did not comply with CHP's Policies. <i>Phillips v. Bratton</i> , 2008 WL 11409876, at *10 (Case No. CV 07-873 CAS (VBKX), C.D. Cal. Jan. 28, 2008).	
182.	Media8.wmv – Training Video Protesters Pepper Sprayed [AGO 1319]	P MIL 1. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 404 impermissible	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Findings which dispute Plaintiff's expert's opinion	

		character evidence; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion.	that Officer Bell did not comply with CHP's Policies. <i>Phillips v. Bratton</i> , 2008 WL 11409876, at *10 (Case No. CV 07- 873 CAS (VBKX), C.D. Cal. Jan. 28, 2008).	
183.	Media9.wmv Training Video Arrest for Failure to Stop When Signaled by Police [AGO 1320]	P MIL 1. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 404 impermissible character evidence; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Findings which dispute Plaintiff's expert's opinion that Officer Bell did not comply with CHP's Policies. <i>Phillips v. Bratton</i> , 2008 WL 11409876, at *10 (Case No. CV 07- 873 CAS (VBKX), C.D. Cal. Jan. 28, 2008).	
184.	Media10.wmv – Training Video CHP Tasered Woman Goes into Cardiac Arrest During Traffic Stop [AGO 1321]	P MIL 1. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 404 impermissible character evidence;	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Findings which dispute Plaintiff's expert's opinion that Officer Bell	

		FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion.	did not comply with CHP's Policies. <i>Phillips v. Bratton</i> , 2008 WL 11409876, at *10 (Case No. CV 07-873 CAS (VBKX), C.D. Cal. Jan. 28, 2008).	
185.	Media11.wmv - Training Video Oregon State Police Video Captures Fatal Freeway Shooting [AGO 1322]	P MIL 1. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 404 impermissible character evidence; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Findings which dispute Plaintiff's expert's opinion that Officer Bell did not comply with CHP's Policies. <i>Phillips v. Bratton</i> , 2008 WL 11409876, at *10 (Case No. CV 07-873 CAS (VBKX), C.D. Cal. Jan. 28, 2008).	
186.	Media12.wmv - Training Video Response to Burglary Call - Use of Deadly Force - [AGO 1323]	P MIL 1. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 404 impermissible character evidence; FRE 602 & 611	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Findings which dispute Plaintiff's expert's opinion that Officer Bell did not comply	

		speculation, lacks foundation; FRE 701 & 702 improper opinion.	with CHP's Policies. <i>Phillips v. Bratton</i> , 2008 WL 11409876, at *10 (Case No. CV 07-873 CAS (VBKX), C.D. Cal. Jan. 28, 2008).	
187.	Media13.wmv - Training Video Fleeing Suspect Shot[AGO 1324]	P MIL 1. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 404 impermissible character evidence; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Findings which dispute Plaintiff's expert's opinion that Officer Bell did not comply with CHP's Policies. <i>Phillips v. Bratton</i> , 2008 WL 11409876, at *10 (Case No. CV 07-873 CAS (VBKX), C.D. Cal. Jan. 28, 2008).	
188.	Media15.mpeg - Training Video Officer Discharges Weapon While Suspect is Being Handcuffed [AGO 1325]	P MIL 1. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 404 impermissible character evidence; FRE 602 & 611 speculation, lacks	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Findings which dispute Plaintiff's expert's opinion that Officer Bell did not comply with CHP's	

		foundation; FRE 701 & 702 improper opinion.	Policies. <i>Phillips v. Bratton</i> , 2008 WL 11409876, at *10 (Case No. CV 07-873 CAS (VBKX), C.D. Cal. Jan. 28, 2008).	
189.	Media16.wmv - Training Video Police Detective Pistol Whipped Who Choose Not to Use Force [AGO 1326]	P MIL 1. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 404 impermissible character evidence; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Findings which dispute Plaintiff's expert's opinion that Officer Bell did not comply with CHP's Policies. <i>Phillips v. Bratton</i> , 2008 WL 11409876, at *10 (Case No. CV 07-873 CAS (VBKX), C.D. Cal. Jan. 28, 2008).	
190.	Media17.wmv – Training Video Officer Tense Encounter with Murder Suspect [AGO 1327]	P MIL 1. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 404 impermissible character evidence; FRE 602 & 611 speculation, lacks foundation; FRE	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Findings which dispute Plaintiff's expert's opinion that Officer Bell did not comply with CHP's Policies.	

		701 & 702 improper opinion.	<i>Phillips v. Bratton</i> , 2008 WL 11409876, at *10 (Case No. CV 07- 873 CAS (VBKX)), C.D. Cal. Jan. 28, 2008).	
191.	Media18.wmv – Training Video Suspect Fleeing Beaten with Baton [AGO 1328]	P MIL 1. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 404 impermissible character evidence; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Findings which dispute Plaintiff’s expert’s opinion that Officer Bell did not comply with CHP’s Policies. <i>Phillips v. Bratton</i> , 2008 WL 11409876, at *10 (Case No. CV 07- 873 CAS (VBKX)), C.D. Cal. Jan. 28, 2008).	
192.	Media19.wmv - Training Video Long Beach Police Caught on Camera Bating Suspect with Baton [AGO 1329]	P MIL 1. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 404 impermissible character evidence; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Findings which dispute Plaintiff’s expert’s opinion that Officer Bell did not comply with CHP’s Policies. <i>Phillips v. Bratton</i> ,	

		improper opinion.	2008 WL 11409876, at *10 (Case No. CV 07-873 CAS (VBKX), C.D. Cal. Jan. 28, 2008).	
193.	Media22.wmv – Training Video Traffic Stop Brake Light Broken [AGO 1331]	P MIL 1. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 404 impermissible character evidence; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Findings which dispute Plaintiff’s expert’s opinion that Officer Bell did not comply with CHP’s Policies. <i>Phillips v. Bratton</i> , 2008 WL 11409876, at *10 (Case No. CV 07-873 CAS (VBKX), C.D. Cal. Jan. 28, 2008).	
194.	Media23.wmv – Training Video Marijuana on Suspect [AGO 1332]	P MIL 1. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 404 impermissible character evidence; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Findings which dispute Plaintiff’s expert’s opinion that Officer Bell did not comply with CHP’s Policies. <i>Phillips v. Bratton</i> , 2008 WL	

			11409876, at *10 (Case No. CV 07-873 CAS (VBKX), C.D. Cal. Jan. 28, 2008).	
195.	Media24.wmv – Training Video Has a Gun[AGO 1333]	P MIL 1. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 404 impermissible character evidence; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Findings which dispute Plaintiff’s expert’s opinion that Officer Bell did not comply with CHP’s Policies. <i>Phillips v. Bratton</i> , 2008 WL 11409876, at *10 (Case No. CV 07- 873 CAS (VBKX), C.D. Cal. Jan. 28, 2008).	
196.	Media25.wmv – Training Video Billings PD Officer Emotional Response to Shooting [AGO 1334]	P MIL 1. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 404 impermissible character evidence; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Findings which dispute Plaintiff’s expert’s opinion that Officer Bell did not comply with CHP’s Policies. <i>Phillips v. Bratton</i> , 2008 WL 11409876, at *10	

			(Case No. CV 07-873 CAS (VBKX), C.D. Cal. Jan. 28, 2008).	
197.	LD_20_V-5.3 [AGO 1335-1456]	P MIL 1. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 404 impermissible character evidence; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Findings which dispute Plaintiff's expert's opinion that Officer Bell did not comply with CHP's Policies. <i>Phillips v. Bratton</i> , 2008 WL 11409876, at *10 (Case No. CV 07-873 CAS (VBKX), C.D. Cal. Jan. 28, 2008).	
198.	LD20 ECO - (CTC I-20) [AGO 1457-1467]	P MIL 1. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 404 impermissible character evidence; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Findings which dispute Plaintiff's expert's opinion that Officer Bell did not comply with CHP's Policies. <i>Phillips v. Bratton</i> , 2008 WL 11409876, at *10 (Case No. CV 07-	

			873 CAS (VBKX), C.D. Cal. Jan. 28, 2008).	
199.	2nd Qtr A&C example block schedule [AGO 1468]	P MIL 1. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 404 impermissible character evidence; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Findings which dispute Plaintiff's expert's opinion that Officer Bell did not comply with CHP's Policies. <i>Phillips v. Bratton</i> , 2008 WL 11409876, at *10 (Case No. CV 07- 873 CAS (VBKX), C.D. Cal. Jan. 28, 2008).	
200.	POST AB 392 835a Video.mp4 [AGO 1469]	P MIL 1. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 404 impermissible character evidence; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Findings which dispute Plaintiff's expert's opinion that Officer Bell did not comply with CHP's Policies. <i>Phillips v. Bratton</i> , 2008 WL 11409876, at *10 (Case No. CV 07- 873 CAS (VBKX),	

1			C.D. Cal. Jan. 28,	
2			2008).	
3	201.	UOF A&C Safety Policy_29582 [AGO 1470-1498]	P MIL 1. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 404 impermissible character evidence; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Findings which dispute Plaintiff's expert's opinion that Officer Bell did not comply with CHP's Policies. <i>Phillips v. Bratton</i> , 2008 WL 11409876, at *10 (Case No. CV 07- 873 CAS (VBKX)), C.D. Cal. Jan. 28, 2008).
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16	202.	2022 UOF A&C POST Certified ECO [AGO 1480-1487]	P MIL 1. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 404 impermissible character evidence; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Findings which dispute Plaintiff's expert's opinion that Officer Bell did not comply with CHP's Policies. <i>Phillips v. Bratton</i> , 2008 WL 11409876, at *10 (Case No. CV 07- 873 CAS (VBKX)), C.D. Cal. Jan. 28,
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203.	Use of Force (UoF A&C) Training Day.pptx [AGO 1499]	P MIL 1. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 404 impermissible character evidence; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Findings which dispute Plaintiff's expert's opinion that Officer Bell did not comply with CHP's Policies. <i>Phillips v. Bratton</i> , 2008 WL 11409876, at *10 (Case No. CV 07-873 CAS (VBKX), C.D. Cal. Jan. 28, 2008).	
204.	RCSD Report by Inv. Manjarrez re Packing Controlled Substance; 03/07/22 [COR 000746-COR 000748]	P MIL 1-2. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 404 impermissible character evidence; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Corroborates defendant Officer Bell's observations that plaintiff was actively resisting and evading arrest because plaintiff was aware that he would be sent back to prison due to being a felon in possession of a firearm and narcotics.	

1	205.	RCSD Report by Inv. Moody re Tox Results for Edgar Solis; 04/12/22 [COR 000762-COR 000766]	P MIL 1-2. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 404 impermissible character evidence; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Corroborates defendant Officer Bell's observations that plaintiff was actively resisting and evading arrest because plaintiff was aware that he would be sent back to prison due to being a felon in possession of a firearm and narcotics.	
14	206.	RCSD Report by Inv. Moody re Ballistic Vest; 04/01/22 [COR 000805-COR 000806]	P MIL 1. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 404 impermissible character evidence; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Corroborates defendant Officer Bell's observations that plaintiff was actively resisting and evading arrest because plaintiff was aware that he would be sent back to prison due to being a felon in possession of a firearm and narcotics.	
27	207.	RCSD Report by Dep. Dittfurth re Suspect Gun to	P MIL 1. FRE 801 hearsay. FRE 401 irrelevant	Official Record. FRE 803(8)(A)(i) and (iii).	

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	Forensics; 03/03/22 [COR 000883-COR 000906]	info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 404 impermissible character evidence; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion.	Business Record. FRE 803(6)(B). Corroborates defendant Officer Bell's observations that plaintiff was actively resisting and evading arrest because plaintiff was aware that he would be sent back to prison due to being a felon in possession of a firearm and narcotics.	
208.	RCSD Report by Inv. Moody re Summary Report for Edgar Solis; 04/13/22 [COR 000990-COR 000992]	P MIL 1. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 404 impermissible character evidence; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Corroborates defendant Officer Bell's observations that plaintiff was actively resisting and evading arrest because plaintiff was aware that he would be sent back to prison due to being a felon in possession of a firearm and narcotics.	
209.	RCSD Report by Inv. Moody re Evidence to Perris Forensic Lab & Armory; 05/19/22 [COR 000993-COR	P MIL 1. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial,	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Corroborates	

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	000994]	cumulative; FRE 404 impermissible character evidence; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion.	defendant Officer Bell's observations that plaintiff was actively resisting and evading arrest because plaintiff was aware that he would be sent back to prison due to being a felon in possession of a firearm and narcotics.	
210.	RCSD Report by Inv. Moody re Suspect Gun Function Test; 05/19/22 [COR 000995-COR 001004]	P MIL 1. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 404 impermissible character evidence; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Corroborates defendant Officer Bell's observations that plaintiff was actively resisting and evading arrest because plaintiff was aware that he would be sent back to prison due to being a felon in possession of a firearm and narcotics.	
211.	RCSD Report by Dep. Kroll re Forensic Report Processing the Suspect Mustang.; 05/19/22 [COR 001037-COR 001040]	P MIL 1. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 602 & 611 speculation, lacks	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Corroborates defendant Officer Bell's observations that plaintiff was	

		foundation; FRE 701 & 702 improper opinion.	actively resisting and evading arrest because plaintiff was aware that he would be sent back to prison due to being a felon in possession of a firearm and narcotics.	
212.	RCSD Report by Dep. Torres re Latent Print Search & DNA Swab.; 05/19/22 [COR 001041-COR 001042]	P MIL 1. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Corroborates defendant Officer Bell's observations that plaintiff was actively resisting and evading arrest because plaintiff was aware that he would be sent back to prison due to being a felon in possession of a firearm and narcotics.	
213.	RCSD Report by Dep. Torres re DNA Collection; 06/21/22 [COR 001048-COR 001049]	P MIL 1. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Corroborates defendant Officer Bell's observations that plaintiff was actively resisting and evading arrest because plaintiff	

1			was aware that he	
2			would be sent back	
3			to prison due to	
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7			narcotics.	
8	214.	RCSD Report by Dep. Kopitzke re Rapid DNA Testing; 06/21/22 [COR 001050-COR 001051]	P MIL 1. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 404 FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Corroborates defendant Officer Bell's observations that plaintiff was actively resisting and evading arrest because plaintiff was aware that he would be sent back to prison due to being a felon in possession of a firearm and narcotics.
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18	215.	RCSD Report by Dep. Anderson re Canvass Interviews; 11/02/22 [COR 001055-COR 001070]	P MIL 1. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 404 impermissible character evidence; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B).
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28	216.	Certificate of	P MIL 1.	Official Record.

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	Detention Form [COR 001071]	FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 404 impermissible character evidence; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion.	FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Corroborates defendant Officer Bell's observations that plaintiff was actively resisting and evading arrest because plaintiff was aware that he would be sent back to prison due to being a felon in possession of a firearm and narcotics.	
217.	Jail Booking Info for Edgar Solis[COR 001072-COR 001073]	P MIL 1. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 404 impermissible character evidence; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B).	
218.	Screenshot of Jail Booking Info for Edgar Solis [COR 001074]	P MIL 1. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 404 impermissible character evidence;	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B).	

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		FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion.		
219.	Adult Disposition of Arrest & Court Action for E. Solis; 03/03/22 [COR 001075]	P MIL 1. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 404 impermissible character evidence; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Corroborates defendant Officer Bell's observations that plaintiff was actively resisting and evading arrest because plaintiff was aware that he would be sent back to prison due to being a felon in possession of a firearm and narcotics.	
			Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Corroborates defendant Officer Bell's observations that plaintiff	

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			was actively resisting and evading arrest because plaintiff was aware that he would be sent back to prison due to being a felon in possession of a firearm and narcotics.	